

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**IN RE CAPACITORS ANTITRUST
LITIGATION**

**Case No. 3:14-cv-03264-JD
MDL No. 2801**

This Document Relates to:

All Actions

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING FLEX'S MOTION
FOR LIMITED MODIFICATION OF
PROTECTIVE ORDER**

1 WHEREAS, on April 23, 2019, Flextronics International USA, Inc. (“Flex”) filed a
2 Motion for Limited Modification of the February 17, 2015 Protective Order, ECF No. 2302
3 (hereinafter, the “Motion”);

4 WHEREAS, on May 7, 2019, Defendants, including Hitachi Chemical, Co., Ltd.,
5 Hitachi AIC Inc., and Hitachi Chemical Co. America, Ltd. (collectively, “Hitachi Chemical”) filed
6 an opposition to Flex’s Motion, ECF No. 2314 (hereinafter, the “Opposition”);

7 WHEREAS, the parties agree that:

8 a. Flex withdraws its request for relief outlined in the Motion as to discovery
9 produced by Hitachi Chemical in this litigation;

10 b. Hitachi Chemical withdraws as a signatory to the Opposition;

11 c. All provisions of the February 17, 2015 Protective Order, ECF No. 563,
12 including paragraph 7.1, shall remain in effect as to discovery produced by Hitachi Chemical in this
13 litigation regardless of any modification as a result of Flex’s Motion; and

14 d. This Stipulation shall not otherwise impact the rights of the parties to seek future
15 modifications to the Protective Order.

16 **IT IS SO STIPULATED.**
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1 Dated: May 13, 2019

Respectfully submitted,

2 **WILLIAMS MONTGOMERY & JOHN LTD.**

3 By: /s/ Charles E. Tompkins

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22 By: /s/ Chul Pak

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*Attorney for Defendants Hitachi Chemical Co., Ltd.,
Hitachi Chemical Co. America, Ltd. and Hitachi AIC,
Inc.*

1 **IT IS SO ORDERED.**

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4 Dated: 5/24/19



HONORABLE JAMES DONATO
UNITED STATES DISTRICT JUDGE

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11 Pursuant to Civil Local Rule 5.1(i)(3), I attest that all other signatories listed, and on whose
12 behalf the filing is submitted, concur in the filing's content and have authorized the filing.

13 Dated: May 13, 2019

/s/ Chul Pak
Chul Pak